

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

Raymond Doricchi, Plaintiff, v. Greenville County Sheriff's Department, et al. Defendant.	C. A. NO. 6:17-cv-01636-TMC DEFENDANT GREENVILLE COUNTY SHERIFF'S DEPARTMENT'S 26(a)(3) PRE-TRIAL DISCLOSURES
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The defendant submits the following in response to Rule 26(a)(3) Pre-Trial Disclosures.

(i) The name and, if not previously provided, the address and telephone number of each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises;

A. Defendant expects to call:

1. Jeremy Jones
2. Sgt. H. Weinmueller
3. Lt. Scot Brewer
4. Lt. M. A. East
5. Deputy Avigliano - served warrant(s)/obtained statement(s)
6. Justin Lanford - responded to GMH and transported plaintiff to Detention Center.
7. Judge Thompson issued warrants.
8. Judge O'Brien issued warrant for Polk County Fugitive
9. Kera Bennick - Property & Evidence
10. Jennifer Joley - Property & Evidence
11. James W. Armstrong - See Drug Analysis Test
12. Miles Dean Bryant - See statement
13. Larry Burger
14. Medical personnel who rendered care and/or treatment to

the plaintiff

- a. L. Chase Allen, MD
- b. B. F. Tripp Masters, III, MD

B. Defendants may call:

- 1. Capt. James Beaver
- 2. Judge Stilwell
- 3. Judge Cagle
- 4. Judge Ayers
- 5. Judge Metz Looper
- 6. Ryan Holloway, Solicitor's Office
- 7. Jennifer Joley - Property & Evidence
- 8. Michael Robert Koerner, MD
- 9. Jacqueline Wiles
- 10. Kate Wessinger
- 11. Lauren Lapierre, RN
- 12. Patricia Love, RC
- 13. Teresa Oldson, MD

(ii) **The designation of those witnesses whom testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony; and**

None, upon information and belief.

(iii) [A]n appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

A. Defendant expects to offer:

- 1. Memo of Capt. M. A. East to Sheriff Steve Loftis dated 5/12/15;
- 2. Response to Resistance/Aggression dated 5/9/15
- 3. Incident Report/Supplemental of Jeremy Jones dated 5/9/15
- 4. Supplemental Report of Justin Lanford dated 5/10/15
- 5. Witness Statement of Miles Dean Bryant dated 5/9/15
- 6. Property & Evidence forms

6. Public Safety Laboratory Analysis Request & Drug Analysis forms
7. Arrest Warrant 2015A2330203896, Resisting/Resisting Arrest
8. Arrest Warrant 2015A2330203897, Drugs/Possession of less than one gram of meth or cocaine base
9. Arrest Warrant 2015A2330203894, Disorderly/Public Disorderly Conduct
10. Arrest Warrant 2015A2330203899, Report/Giving False Information to law enforcement
11. Arrest Warrant 2015A2330203898, Ordinance/Possession of Drug Par
12. Indictment Records
13. Chain of Custody Report(s)
14. CAD reports, 911 calls and/or Radio Traffic
15. Criminal record of plaintiff
16. Prior arrest record of plaintiff

B. Defendant may offer:

1. Training file of Jeremy Jones
2. Medical records of the plaintiff.
3. General Order 205, Response to Resistance/Aggression
4. SC Code of Ordinances, Article III: Drug Paraphernalia

Respectfully submitted,

CHAPMAN, HARTER & HARTER, P.A.

s/ Russell W. Harter, Jr.
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Greenville, South Carolina
February 18, 2020